

EXHIBIT 2

Respondents' Age and Gender

Age Group	Male		Female		Overall	
	Count	Percent	Count	Percent	Count	Percent
18-34	64	31.5%	65	34.2%	130	32.9%
35-54	69	34.0%	59	31.1%	129	32.7%
55+	70	34.5%	66	34.7%	136	34.4%
Total Respondents	203	100.0%	190	100.0%	395	100.0%

Note: One respondent in the age group 18-34 and one respondent in the age group 35-54 selected "Gender variant / Non-conforming".

Respondents' Census Region

Region	Count	Percent
Northeast	88	22.3%
Midwest	63	15.9%
South	139	35.2%
West	105	26.6%
Total Respondents	395	100.0%

Respondents' Race/Ethnicity

Response	Count	Percent¹
White / Caucasian	283	71.6%
Black / African American	70	17.7%
Hispanic / Latino	48	12.2%
Asian / Pacific Islander	20	5.1%
Native American	8	2.0%
Middle Eastern / Arab	3	0.8%
Not Listed. Please Indicate:	1	0.3%
Prefer not to answer	3	0.8%
Total Respondents	395	

S14. Which of the following represents you?

Note: ¹ Percent may not add up to 100 because respondents can select multiple types.

Respondents' Preference on Private Versus Public Litigation Strategy

Response	Count	Percent
Strategy 1 (Private Strategy)	134	33.9%
Strategy 2 (Public Strategy)	185	46.8%
No preference	54	13.7%
Not enough information to determine	22	5.6%
Something else	0	0.0%
Total Respondents	395	100.0%

Q1. The law firms seeking to represent the class disagree about which litigation strategy to pursue:

Strategy 1 : *Some attorneys believe that the best way to help the class is to negotiate the case privately with 23andMe and settle the case quickly by using a third-party mediator, directly obtaining information from 23andMe on a voluntary basis, and resolving the case before the court weighs in on the validity of the claims.*

The pros of this strategy include lower risk (i.e., greater certainty in the case's outcome and greater certainty in securing some compensation for the class), and a speedy resolution. The cons of this strategy are that it can result in smaller settlements or incomplete relief due to the lack of full information about the extent of the defendant's actions, the data breach, and the breach's negative effects.

Strategy 2 : *Some attorneys believe that the best way to help the class is to work through the public court system before reaching a settlement. The goal is to obtain full information through the formal court-supported discovery process and to get a sense of the strength of the class's claims by first advancing them in court.*

The pros of this strategy include the possibility of a larger settlement or more complete relief resulting from a fuller picture of the defendant's conduct, the extent of the data breach, and the breach's negative effects on class members. The cons of this strategy are that it could be riskier (i.e., less certainty in the case's outcome and less certainty of obtaining compensation for class members) and that it takes longer to resolve the case.

Respondents' Preference on Timing Strategy to File a Lawsuit

Response	Count	Percent
Strategy 1 (As quickly as possible)	72	18.2%
Strategy 2 (Take time to thoroughly investigate)	266	67.3%
No preference	33	8.4%
Not enough information to determine	24	6.1%
Something else	0	0.0%
Total Respondents	395	100.0%

Q6. After a data breach like 23andMe's happens, law firms typically take one of two strategies:

Strategy 1 : File a lawsuit against the company as quickly as possible.

Strategy 2 : Take time to thoroughly investigate the breach (including its extent and the defendant's conduct before and after the breach) and customers' potential claims prior to filing suit.

Respondents' Preference on Number of Firms Representing their Case

Response	Count	Percent
Prefer a team of many firms	98	24.8%
Prefer a team of one or two firms	196	49.6%
No preference	67	17.0%
Not enough information to determine	34	8.6%
Something else	0	0.0%
Total Respondents	395	100.0%

Q7. A court will ultimately decide which law firm or law firms will represent the class against 23andMe in the lawsuit. Some attorneys believe the court should appoint a team of many firms to collaborate on the case, dividing work amongst themselves. Other attorneys believe that the court should pick just one or two law firms with the capacity to handle all of the work efficiently.

Which approach to do you prefer?

Average Importance Rating Across All Relevant Questions Regarding Firm Representation Preferences

Related Question	Avg Importance Rating
Q4. Representation by a firm that focuses on measures preventing others from using data to harass, intimidate, harm, or discriminate against them	6.50
Q10. Representation by a firm that has significant experience handling privacy class actions	6.32
Q15. Representation by a firm that demonstrates long-term financial viability	6.29
Q9. Representation by a firm that has experience handling legal cases under state genetic privacy laws	6.26
Q17. Representation by a firm that makes an effort to communicate with the class in order to consider class members' preferences	6.26
Q13. Representation by a firm that has its own team of forensic investigators or technical experts on staff	6.20
Q8. Representation by a firm that pursues claims under state genetic privacy laws	6.18
Q2. Representation by a firm with a track record of negotiating larger cash payments	6.17
Q3. Representation by a firm with a track record of higher percentages of class members getting paid	6.10
Q16. Representation by a firm that has been able to attract the best attorneys	6.09
Q14. Representation by a firm that seeks attorneys' fees of no more than 20% of the settlement fund	5.97
Q11. Representation by a firm that has a track record of obtaining large settlements or verdicts in privacy class actions	5.96
Q5. Representation by a firm that seeks special protection for members of Ashkenazi Jewish descent and Chinese descent	5.96
Q12. Representation by a firm that has attorneys from diverse backgrounds performing meaningful work on the case	5.53

te: Importance ratings were assigned to the following response options as follows: "Not Important at All" = 1, "Unimportant" = 2, "Somewhat Unimportant" = 3, "Neither Unimportant Nor Important" = 4, "Somewhat Important" = 5, "Important" = 6, and "Very Important" = 7.

Respondents' Assigned Importance to Being Represented by a Firm with a Track Record of Negotiating Larger Cash Payments

Response	Count	Percent
1 - Not Important at All	3	0.8%
2 - Unimportant	0	0.0%
3 - Somewhat Unimportant	4	1.0%
4 - Neither Unimportant Nor Important	20	5.1%
5 - Somewhat Important	56	14.2%
6 - Important	121	30.6%
7 - Very Important	191	48.4%
Total Respondents	395	100.0%
Average Importance Rating	6.17	

Q2. There are a range of possible outcomes in class action litigation. Many privacy settlements primarily offer credit monitoring—i.e., a service that reviews your credit report for suspicious activity to protect your credit score—or small cash amounts (like \$10 or \$20). Other settlements are focused on providing larger amounts of cash relief to class members.

How important is it to you that the law firm representing the class has a track record of negotiating settlements that result in larger cash payments to class members?

Respondents' Assigned Importance to Being Represented by a Firm with a Track Record of Higher Percentages of Class Members Getting Paid

Response	Count	Percent
1 - Not Important at All	3	0.8%
2 - Unimportant	4	1.0%
3 - Somewhat Unimportant	5	1.3%
4 - Neither Unimportant Nor Important	23	5.8%
5 - Somewhat Important	60	15.2%
6 - Important	110	27.8%
7 - Very Important	190	48.1%
Total Respondents	395	100.0%
Average Importance Rating	6.10	

Q3. In most class action settlements, class members receive cash payments only if they submit a valid claim form to the settlement administrator. The percentage of people that submit claims and get paid (called a “claims rate”) can range on the low end from 1%-5%, to as high as 25% or more. Law firms play a significant role in determining the percentage of class members who get paid by, among other things, designing a strong notice program that tells class members about the settlement and making it easy to submit a claim.

How important is it to you that the law firm representing the class has a track record of having higher percentages of class members that get paid?

Respondents' Assigned Importance to Being Represented by a Firm that Focuses on Measures Preventing Others from Using Data to Harass, Intimidate, Harm, or Discriminate Against Them

Response	Count	Percent
1 - Not Important at All	1	0.3%
2 - Unimportant	3	0.8%
3 - Somewhat Unimportant	0	0.0%
4 - Neither Unimportant Nor Important	12	3.0%
5 - Somewhat Important	24	6.1%
6 - Important	92	23.3%
7 - Very Important	263	66.6%
Total Respondents	395	100.0%
Average Importance Rating	6.50	

Q4. The 23andMe data breach involved incredibly sensitive information, including customers' genetic heritage, ancestral origin, full names, home addresses, profile pictures, and birth dates. Hackers have already posted some of this information on the Dark Web identifying lists of certain vulnerable groups.

How important is it to you that the law firm representing the class focuses on getting measures that would prevent others from using your data to harass, intimidate, harm, or discriminate against you online or in real life?

Respondents' Assigned Importance to Being Represented by a Firm that Seeks Special Protection for Members of Ashkenazi Jewish and Chinese Descent

Response	Count	Percent
1 - Not Important at All	9	2.3%
2 - Unimportant	2	0.5%
3 - Somewhat Unimportant	2	0.5%
4 - Neither Unimportant Nor Important	38	9.6%
5 - Somewhat Important	59	14.9%
6 - Important	105	26.6%
7 - Very Important	180	45.6%
Total Respondents	395	100.0%
Average Importance Rating	5.96	

Q5. Individuals of Ashkenazi Jewish and Chinese descent are facing a greater risk of harm because hackers put their specific data up for sale on the Dark Web. This opens the door to threats of “domestic extremism” (as one Congressman put it) or being targeted by government actors.

How important is it to you that the law firm representing the class seeks special protection for members of these ethnic groups?

Respondents' Assigned Importance to Being Represented by a Firm that Pursues Claims Under State Genetic Privacy Laws

Response	Count	Percent
1 - Not Important at All	3	0.8%
2 - Unimportant	1	0.3%
3 - Somewhat Unimportant	4	1.0%
4 - Neither Unimportant Nor Important	19	4.8%
5 - Somewhat Important	58	14.7%
6 - Important	111	28.1%
7 - Very Important	199	50.4%
Total Respondents	395	100.0%
Average Importance Rating	6.18	

Q8. Some states have genetic privacy laws that may apply to the 23andMe data breach. For example, under Illinois's Genetic Information Privacy Act, a person can get \$2,500 if it's proven that 23andMe negligently violated the law, and \$15,000 if 23andMe is found to have intentionally or recklessly violated the law. With this in mind, please respond to the following questions:

How important is it to you that the law firm representing the class pursues claims under state genetic privacy laws?

**Respondents' Assigned Importance to Being Represented by a Firm that Has Experience Handling
Legal Cases Under State Genetic Privacy Laws**

Response	Count	Percent
1 - Not Important at All	3	0.8%
2 - Unimportant	1	0.3%
3 - Somewhat Unimportant	5	1.3%
4 - Neither Unimportant Nor Important	16	4.1%
5 - Somewhat Important	45	11.4%
6 - Important	111	28.1%
7 - Very Important	214	54.2%
Total Respondents	395	100.0%
Average Importance Rating	6.26	

Q9. Some states have genetic privacy laws that may apply to the 23andMe data breach. For example, under Illinois's Genetic Information Privacy Act, a person can get \$2,500 if it's proven that 23andMe negligently violated the law, and \$15,000 if 23andMe is found to have intentionally or recklessly violated the law. With this in mind, please respond to the following questions:

How important is it to you that the law firm representing the class has experience handling legal cases under state genetic privacy laws?

Respondents' Assigned Importance to Being Represented by a Firm that Has Significant Experience Handling Privacy Class Actions

Response	Count	Percent
1 - Not Important at All	2	0.5%
2 - Unimportant	0	0.0%
3 - Somewhat Unimportant	3	0.8%
4 - Neither Unimportant Nor Important	18	4.6%
5 - Somewhat Important	30	7.6%
6 - Important	131	33.2%
7 - Very Important	211	53.4%
Total Respondents	395	100.0%
Average Importance Rating	6.32	

Q10. How important is it to you that the law firm representing the class has significant experience (i.e., more than ten years) handling privacy class actions?

Respondents' Assigned Importance to Being Represented by a Firm that Has a Track Record Obtaining Large Settlements or Verdicts in Privacy Class Actions

Response	Count	Percent
1 - Not Important at All	4	1.0%
2 - Unimportant	2	0.5%
3 - Somewhat Unimportant	2	0.5%
4 - Neither Unimportant Nor Important	37	9.4%
5 - Somewhat Important	72	18.2%
6 - Important	112	28.4%
7 - Very Important	166	42.0%
Total Respondents	395	100.0%
Average Importance Rating	5.96	

Q11. How important is it to you that the law firm representing the class has a track record of obtaining large settlements or verdicts (i.e., over \$500 million in cash relief) in privacy class actions?

Respondents' Assigned Importance to Being Represented by a Firm that Has Attorneys from Diverse Backgrounds Performing Meaningful Work on the Case

Response	Count	Percent
1 - Not Important at All	20	5.1%
2 - Unimportant	6	1.5%
3 - Somewhat Unimportant	16	4.1%
4 - Neither Unimportant Nor Important	51	12.9%
5 - Somewhat Important	56	14.2%
6 - Important	101	25.6%
7 - Very Important	145	36.7%
Total Respondents	395	100.0%
Average Importance Rating	5.53	

Q12. How important is it to you that the law firm representing the class has attorneys from diverse backgrounds performing meaningful work on the case (e.g. diversity based on age, gender, race, etc.)?

Respondents' Assigned Importance to Being Represented by a Firm that Has its Own Team of Forensic Investigators or Technical Experts on Staff

Response	Count	Percent
1 - Not Important at All	3	0.8%
2 - Unimportant	0	0.0%
3 - Somewhat Unimportant	1	0.3%
4 - Neither Unimportant Nor Important	25	6.3%
5 - Somewhat Important	47	11.9%
6 - Important	125	31.6%
7 - Very Important	194	49.1%
Total Respondents	395	100.0%
Average Importance Rating	6.20	

Q13. Data breach cases, like this one, can be highly technical. They require knowledge of data security best practices and industry standards. It is also often necessary to analyze complex source code to understand how the breach happened and how it could have been prevented.

How important is it to you that the law firm representing the class has its own team of forensic investigators or other technical experts on staff?

Respondents' Assigned Importance to Being Represented by a Firm that Seeks Attorneys' Fees of No More than 20% of the Settlement Fund

Response	Count	Percent
1 - Not Important at All	4	1.0%
2 - Unimportant	4	1.0%
3 - Somewhat Unimportant	9	2.3%
4 - Neither Unimportant Nor Important	31	7.8%
5 - Somewhat Important	62	15.7%
6 - Important	111	28.1%
7 - Very Important	174	44.1%
Total Respondents	395	100.0%
Average Importance Rating	5.97	

Q14. In the court where this case will be litigated, lawyers typically seek 25% of the settlement fund as attorneys' fees, but they can request more or less in fees. When the law firms apply to be the main firm in charge of the case, they can promise to limit their fee request.

How important is it to you that the law firm representing the class agrees to seek attorneys' fees of no more than 20% of the settlement fund?

Respondents' Assigned Importance to Being Represented by a Firm that Demonstrates Long-Term Financial Viability

Response	Count	Percent
1 - Not Important at All	2	0.5%
2 - Unimportant	0	0.0%
3 - Somewhat Unimportant	3	0.8%
4 - Neither Unimportant Nor Important	17	4.3%
5 - Somewhat Important	42	10.6%
6 - Important	123	31.1%
7 - Very Important	208	52.7%
Total Respondents	395	100.0%
Average Importance Rating	6.29	

Q15. Litigating large class actions can take time (often years), and the law firms representing the class front much of the costs of litigation.

How important is it to you that the law firm representing the class has demonstrated long-term financial viability (i.e., that the firm has enough money to handle the case without being constrained by its own finances)?

Respondents' Assigned Importance to Being Represented by a Firm that Has Been Able to Attract the Best Attorneys

Response	Count	Percent
1 - Not Important at All	4	1.0%
2 - Unimportant	3	0.8%
3 - Somewhat Unimportant	0	0.0%
4 - Neither Unimportant Nor Important	25	6.3%
5 - Somewhat Important	56	14.2%
6 - Important	132	33.4%
7 - Very Important	175	44.3%
Total Respondents	395	100.0%
Average Importance Rating	6.09	

Q16. Law firms have different approaches to recruiting top talent. For example, some law firms pay significant salaries, recruit at top law schools, and/or provide unique benefits.

How important is it to you that the law firm representing the class has been able to attract the best attorneys?

Respondents' Assigned Importance to Being Represented by a Firm that Makes an Effort to Communicate with the Class in Order to Consider Class Members' Preferences

Response	Count	Percent
1 - Not Important at All	1	0.3%
2 - Unimportant	1	0.3%
3 - Somewhat Unimportant	10	2.5%
4 - Neither Unimportant Nor Important	18	4.6%
5 - Somewhat Important	39	9.9%
6 - Important	110	27.8%
7 - Very Important	216	54.7%
Total Respondents	395	100.0%
Average Importance Rating	6.26	

Q17. How important is it to you that the law firm representing the class makes an effort to communicate with the class in order to consider class members' preferences?